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STATE OF COLORADO

Roy Romer, Governor Patricia A. Nolan, MD, MPH, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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September 12, 1994

Mr. Mark A. Silverman Manager, Rocky Flats Field Office U.S. Department of Energy P.O. Box 928 Golden, CO 80402-0928

RE: 904 Pad (RCRA Unit 15B) Mixed Waste Storage Area

Dear Mr. Silverman:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division), has reviewed the Department of Energy's (DOE) February 1994 Compliance Plan (hereafter called the Plan) for the 750/904 Pads located at the Rocky Flats Environmental Technology Site (RFETS). As a result of the Plan, the Division has met several times with representatives from RFETS to discuss the compliance of Unit 15B.

In the Plan DOE proposed to repackage the saltcrete and pondcrete currently stored on Unit 15B. DOE has stated that a large percentage of the existing pondcrete blocks stored on the 904 Pad contain measurable free liquids and has acknowledged the inadequate inspectability and secondary containment currently existing at the 904 Pad. The repackaging process would utilize metal crates which would be both inspectable and act as adequate secondary containment.

During an April 6, 1994 meeting with representatives from RFETS, the Division identified areas in which the Plan lacked sufficient detail. In particular, the Division was concerned with the proposed schedule for repackaging. The Plan identified the initial delivery of the metal crates in early June 1994, and repacking to begin in mid June 1994. At that time, representatives from RFETS informed the Division that a contract for the purchase of metal crates would be finalized within the next 2-3 weeks. During an August 30, 1994 meeting with RFETS representatives, the Division was once again informed that a contract for the metal crates had not been obtained but should be finalized within the next 1-2 weeks. At the time of this letter, the Division is unaware of a finalized contract.

During the time between the April 6, 1994 meeting and the August 30, 1994 meeting, the 904 Pad experienced an incident which resulted in a release of approximately 70 pounds of saltcrete. The release was a result of deteriorating containment (tri-walls). The integrity and longevity of

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the tri-walls is unknown and poses an unnecessary risk for workers at RFETS and potentially the environment.

The Division is requiring RFETS to submit a revised Plan that will include a schedule detailing when repacking will begin and a date for completion. The schedule must be entered into the RFETS Plant Action Tracking System (PATS). The Plan must also include a provision for biweekly updates to the Division, this update may be either verbal or in writing. The revised Plan must be submitted to the Division within 7 calendar days of receipt of this letter.

If you have any question regarding this letter please contact either Chris Gilbreath at (303) 692-3371 or Cathy Alstatt at (303) 692-3349.

Sincerely,

Frederick R. Dowsett, Section Chief

Monitoring and Enforcement

Hazardous Waste Control Program

cc:

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S. Tarlton, CDPHE-OE

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